

Patrick J. Murphy, WSB No. 5-1779  
Scott C. Murray, WSB No. 7-4896  
WILLIAMS, PORTER, DAY & NEVILLE, PC  
159 N. Wolcott, Ste. 400  
P.O. Box 10700 (82602)  
Casper, WY 82601  
Email: [pmurphy@wpdn.net](mailto:pmurphy@wpdn.net)  
[smurray@wpdn.net](mailto:smurray@wpdn.net)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

BCB CHEYENNE LLC d/b/a BISON	)	
BLOCKCHAIN, a Wyoming limited liability	)	
company,	)	
Plaintiff,	)	
v.	)	Civil Action No. 23-CV-79-ABJ
MINEONE WYOMING DATA CENTER	)	
LLC, a Delaware limited liability company;	)	
MINEONE PARTNERS LLC, a Delaware	)	
limited liability company; TERRA	)	
CRYPTO, INC., a Delaware corporation;	)	
BIT ORIGIN, LTD, a Cayman Island	)	
Company; SONICHASH LLC, a Delaware	)	
limited liability company; BITMAIN	)	
TECHNOLOGIES HOLDING COMPANY,	)	
a Cayman Island Company; BITMAIN	)	
TECHNOLOGIES GEORGIA LIMITED, a	)	
Georgia corporation; and JOHN DOES 1-18,	)	
related persons and companies who control	)	
or direct some or all of the named	)	
Defendants,	)	
Defendants.	)	

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**EXHIBIT A  
TO BCB CHEYENNE LLC d/b/a BISON BLOCKCHAIN'S  
SUBPOENA DUCES TECUM TO REPUBLIC TITLE OF TEXAS, INC.  
IN A CIVIL ACTION**

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REPUBLIC TITLE OF TEXAS, INC. is commanded to produce copies of the following documents to Patrick J. Murphy at WILLIAMS, PORTER, DAY & NEVILLE, P.C. at 159 N. Wolcott Street, Suite 400, Casper, WY 82601, or by emailing the documents to [pmurphy@wpdn.net](mailto:pmurphy@wpdn.net) by June 11, 2024 at 10:00 a.m., as follows:

#### **DEFINITIONS**

1. "Document" shall have the full meaning ascribed to it in Rule 34 of the Federal Rules of Civil Procedure and shall include every writing or record of every type and description, including, but not limited to, agreements, contracts, contract files, correspondence, memoranda, publications, pamphlets, promotional materials, studies, books, tables, charts, graphs, schedules, e-mails, text messages, photographs, films, voice recordings, reports, surveys, analyses, journals, ledgers, telegrams, stenographic or handwritten notes, minutes of meetings, transcripts, financial statements, purchase orders, vouchers, invoices, bills of sale, bills of lading, credit and billing statements, checks, manuals, circulars, bulletins, instructions, sketches, diagrams, computer programs, printouts, punch cards, tabulations, logs, telephone records, desk calendars, diaries, appointment books, computer data, tapes, and disks; and includes all drafts or copies of every such writing or record whenever a draft or copy of a document is not an identical copy of the original or where such draft or copy contains any commentary or notes that do not appear on the original.
2. "Communications" shall mean all written, oral, telephonic, electronic, e-mail, text, or other transmittal of words, thoughts, ideas, and images, including, but not limited to, inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, letters, notes, telegrams, advertisements, press releases, publicity releases, trade releases, and interviews.

3. The term "relating to" shall mean directly or indirectly mentioning or describing, comprising, consisting of, referring to, reflecting on, or being in any way logically or factually connected with the matter discussed.

4. The term "North Range" shall mean of, concerning, or relating in any way to the improved real property commonly known as 635 Logistics Drive in the City of Cheyenne, Laramie County, Wyoming 82009 and the related electrical power contracts with Black Hills Energy for the BCIS power (~45 megawatts) and expansion power (~25 megawatts).

5. The term "Campstool" shall mean of, concerning, or relating to the real property known as Lot 1 Block 4 Venture Dr., in the City of Cheyenne, Laramie County, Wyoming 82007 and the related electrical power contracts with Black Hills Energy for the BCIS power (~30 megawatts) and expansion power (~30 megawatts).

#### **DOCUMENTS REQUESTED**

1. Produce a true, correct, and complete copy of any and all documents and correspondence (letters, emails, texts, wiring requests, wiring confirmations, receipts) Republic Title of Texas, Inc., has received from and or sent to (a) anyone associated with CleanSpark, Inc., including any attorney representing CleanSpark, Inc., and (b) anyone associated with MineOne Wyoming Data Center, LLC, Terra Crypto, Inc., and/or MineOne Partners, Ltd., including any attorney representing MineOne Wyoming Data Center, LLC, Terra Crypto, Inc., and/or MineOne Partners, Ltd. (collectively, the "MineOne Parties") of, concerning, or relating in any way to: (i) North Range; (ii) Campstool; (iii) the bitcoin mining operations from facilities (the "PODS") located, or previously located, at North Range, between April 1, 2024 – June 11, 2024; (iv) the negotiations between any of the MineOne Parties and CleanSpark, Inc. for the purchase of the North Range and Campstool Properties; and (v) the assignment or transfer of the electrical power services contract(s) with Black Hills Energy related to the North Range Property and Campstool Property.

2. Produce all the evidence of any payments – and the amounts of any payments – anyone with Republic Title of Texas, Inc. has made to any of the MineOne Parties pursuant to or in relation to the May 8, 2024 PURCHASE AND SALE AGREEMENT<sup>1</sup> (“PSA”), including any amendments thereto, as well as any new/subsequent agreements between MineOne Wyoming Data Center LLC and CleanSpark, Inc. relating to (i) North Range, (ii) Campstool and/or (iii) the electrical power services contract(s) with Black Hills Energy.
3. Produce all the evidence of any payment(s) – and the amounts of any payments – anyone with CleanSpark, Inc. has made to the Escrow Holder, Republic Title of Texas, Inc., between May 8, 2024 – June 11, 2024<sup>2</sup> relating to North Range and/or Campstool pursuant to the MineOne/CleanSpark PSA, any amendments thereto, as well as any new/subsequent agreements between MineOne Wyoming Data Center LLC and CleanSpark, Inc. relating to (i) North Range, (ii) Campstool, and/or (iii) the electrical power services contract(s) with Black Hills Energy.
4. Produce true and complete copies of any and all correspondence (letters, emails, texts, wiring requests, wiring confirmations, receipts) that anyone with CleanSpark, Inc., or any agent, attorney or authorized representative of CleanSpark, Inc., has had with Republic Title of Texas, Inc., or anyone employed by or connected with Republic Title of Texas, Inc., especially Misti Michelle Ellis, since April 1, 2024, concerning or relating in any way to the PSA or monies to be held by Republic Title of Texas, Inc.
5. Produce a true and correct copy of the Escrow Agreement or contract with Republic Title of Texas, Inc. relating to (i) the PSA, (ii) any amendments to the PSA, and (iii) any new/subsequent agreements between MineOne Wyoming Data Center LLC and CleanSpark, Inc. involving North Range, Campstool and/or the electrical power services contract(s) with Black Hills Energy.
6. Please produce a true and correct copy of any escrow instructions and/or communications Republic Title of Texas, Inc. has sent to or received from CleanSpark, Inc. and/or any of the MineOne Parties relating to (i) the PSA, (ii) any amendments to the PSA, and (iii) any new/subsequent agreements between MineOne Wyoming Data Center LLC and CleanSpark, Inc. involving North Range, Campstool and/or the electrical power services contract(s) with Black Hills Energy.

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<sup>1</sup> <https://contracts.justia.com/companies/cleanspark-inc-7310/contract/1283284/>

<sup>2</sup> In the Court’s Order on Plaintiff’s *Emergency Motion*, the Court relied on what Ms. Colbath, MineOne’s counsel, represented to the Court when she stated: “There is no emergency present, no money has exchanged hands and no money will for at least 30 days [from May 17, 2024], and likely longer” [ECF 194 at p. 4]. As such, and given the June 11, 2024 request date of this subpoena, please produce a second round of documents and communications for Request #2 (*i.e.*, from June 12, 2024 through June 17, 2024) to Patrick Murphy on June 18, 2024, by 5:00 pm.

**Please also note:** All documents and communication requests under this subpoena are being done so on an emergency basis. A representative of Republic Title of Texas, Inc. has been provided the Stipulated Protective Order that was entered in this civil action on December 6, 2023. All documents and communication requested and provided under this subpoena will be treated as confidential under this civil action's Stipulated Protective Order.

Please email the documents and communication in the request above to [pmurphy@wpdn.net](mailto:pmurphy@wpdn.net) by June 11, 2024 at 10:00 a.m.

RESPECTFULLY SUBMITTED this 31<sup>st</sup> day of May 2024.

BCB CHEYENNE LLC d/b/a  
BISON BLOCKCHAIN,

Plaintiff

By:   
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Patrick J. Murphy, WSB No. 5-1779  
Scott C. Murray, WSB No. 7-4896  
WILLIAMS, PORTER, DAY & NEVILLE, PC  
159 N. Wolcott, Ste. 400  
Casper, WY 82601  
(307) 265-0700  
[pmurphy@wpdn.net](mailto:pmurphy@wpdn.net)  
[smurray@wpdn.net](mailto:smurray@wpdn.net)

*Attorneys for Plaintiff BCB Cheyenne LLC  
d/b/a Bison Blockchain*